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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

CHARMAINE CHUA, et al.,

PLAINTIFFS,

vs.

CITY OF LOS ANGELES, et al.,

DEFENDANTS.

Case No.: 16-cv-00237-JAK-GJS

**STIPULATION OF THE PARTIES  
REQUESTING AN EXTENSION  
OF THE DATE TO COMPLETE  
THE COURT ORDERED  
MEDIATION AND TO REPORT  
TO COURT**

**TRIAL DATE  
DATE: DECEMBER 5, 2017  
TIME: 9:00 A.M.  
CTRM: 10B, FIRST STREET**

**HON. JOHN A. KRONSTADT**

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1 TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR COUNSELS  
2 OF RECORD:

3 Come now the parties with **STIPULATION OF THE PARTIES**  
4 **REQUESTING AN EXTENSION OF THE DATE TO COMPLETE THE**  
5 **COURT ORDERED MEDIATION AND TO REPORT TO COURT.**  
6

7 ON SEPTEMBER 19, 2016 THIS COURT ISSUED AT SCHEDULING ORDER (DOC.  
8 35) WHICH INTER ALIA SET A DATES BUT WROTE TBD: LAST DAY TO PARTICIPATE IN A  
9 SETTLEMENT CONFERENCE/MEDIATION.  
10

11 ON NOVEMBER 9, 2016, THIS COURT DISCUSSED THE POSSIBILITIES REGARDING  
12 A SETTLEMENT CONFERENCE. IN CONJUNCTION WITH THE SETTLEMENT COMPLETION  
13 DATES IN TWO OTHER CASES, A DATE OF MARCH 17, 2017 WAS DESIGNATED AS A  
14 DATE OF COMPLETION OF A SETTLEMENT CONFERENCE/MEDIATION IN THIS CASE. THE  
15 COURT REQUESTED THE PARTIES KEEP THIS COURT INFORMED ABOUT WHETHER A  
16 SETTLEMENT CONFERENCE WOULD BE PRODUCTIVE BY THIS DATE.  
17  
18

19 THE PARTIES IN THIS MATTER HAVE AN INADEQUATE TIME TO CONDUCT  
20 MEANINGFUL DISCOVERY IN THIS MATTER.  
21

22 ONE OF THE ISSUES IN THIS MATTER, AS RAISED BY THE COURT PERTAINED TO  
23 THE ADEQUACY OF MR. KYLE TODD AND THE NLG AS A CLASS REPRESENTATIVE. THE  
24 CLASS CERTIFICATION MOTION STANDS AS SUBMITTED AS OF NOVEMBER 21, 2016.  
25

26 BASED UPON THE FOREGOING THE PARTIES DO NOT BELIEVE THERE CAN BE A  
27 PRODUCTIVE DISCUSSION ABOUT CASE RESOLUTION PRIOR TO MARCH 17, 2017.  
28

1 THE PARTIES SUGGEST THAT THE COURT SET THE DATE OF JUNE 12, 2017 AS A DATE BY  
2 WHICH THE MEDIATION/SETTLEMENT CONFERENCE NEEDS TO BE COMPLETED. THE  
3 PARTIES SUGGEST THE COURT SET THE DATE OF JUNE 19, 2017 AS THE DATE BY WHICH  
4 THE PARTIES FILE A JOINT REPORT REGARDING THE STATUS OF SETTLEMENT AND THE  
5 DATE OF JUNE 26, 2017 FOR A STATUS CONFERENCE POST SETTLEMENT CONFERENCE.

6  
7 **ATTESTATION**

8  
9 Pursuant to L.R. 5-4.3.4(a)(2)(i), I hereby attest that Carol A. Sobel, counsel  
10 for Plaintiff, concurs in the content of this filing and has authorized this filing.

11  
12 Dated: February 27, 2017

/S/ Craig J. Miller

Craig J. Miller, Deputy City Attorney

13  
14  
15 Dated: February 27, 2017

Respectfully submitted,

16  
17 Kaye, McLane, Bednarski & Litt, LLP  
18 Law Office of Carol A. Sobel  
19 Schonbrun, Seplow, Harris & Hoffman  
20 Law Office of Colleen Flynn  
21 Law Office of Matthew Strugar

/s/ Carol A. Sobel

22 By: CAROL A. SOBEL  
Attorneys for Plaintiffs

23  
24 Dated: February 27, 2017

Michael N. Feuer, City Attorney  
Thomas Peters, Chief Asst. City Attorney  
Cory M. Brente, Asst. Supv. City Attorney  
Craig J. Mitchell, Dep. City Attorney

/s/ Craig J. Miller

27  
28 By: CRAIG J. MILLER  
Attorneys for Defendantss